

# EXHIBIT 1

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER GRANTING  
GOOGLE LLC'S MOTION TO SEAL  
PORTIONS OF CLASS  
CERTIFICATION & DAUBERT  
BRIEFING**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17<sup>th</sup> Floor

Action Filed: July 14, 2020  
Trial Date: Not Set

Before the Court is Defendant Google LLC's Statement in Support of Motion to Seal Portions of Class Certification & *Daubert* Briefing (Dkts. 314 & 321) and documents filed therewith.

Having considered Plaintiffs' Administrative Motion to Seal Portions of Motion for Class Certification [Dkt. 315] and Google's Statement in Support of Motion to Seal Portions of Class Certification & *Daubert* Briefing, the Declaration of David Monsees, and the Declaration of Kevin Lam, the Court finds that the material identified in Google's Statement in Support should be sealed.

Accordingly, the Court orders that the following should be sealed:

The following exhibits and expert reports attached to Plaintiffs' Motion for Class Certification ("Motion") [Dkt. 315]:

Exhibit No.	Bates No. / Pages with Designations	Description
Plaintiffs' Motion for Class Certification	Page 2, lines 4-5	Internal metrics
	Page 2, lines 20 - 22	Internal strategy
	Page 3, lines 5 – 7	Internal strategy
	Page 3, lines 10 – 12	Internal strategy
	Page 3, lines 13 - 17	Internal strategy
	Page 6, line 24	Non-public metric
	Page 11, lines 14 - 15	Internal processes
	Page 12, lines 18 – 19	Internal deliberations
	Page 13, lines 14 – 16	Internal processes
	Page 13, lines 17 – 18	Internal processes
	Page 13, lines 19 – 20	Internal processes
	Page 13, lines 21 - 22	Internal processes
	Page 13, line 23	Internal processes
	Page 13, lines 24 – 26	Internal processes
	Page 13, lines 27 – 28	Internal processes
	Page 14, lines 2 - 4	Internal processes
	Page 14, lines 13 - 14	Internal metrics
	Page 14, lines 21 – 23	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Description
	Page 14, line 24	Internal strategy
	Page 14, line 26 - 28	Internal strategy
	Page 15, lines 15 - 17	Internal deliberations
	Page 16, lines 6 - 7	Internal processes
	Page 16, lines 12 - 13	Internal processes
	Page 17, line 12	Internal metrics
	Page 17, lines 25 - 26	Internal deliberations
	Page 19, lines 22 - 24	Internal strategy
	Page 20, lines 1 - 2	Internal metrics
	Page 20, lines 3 - 11	Internal strategy
	Page 20, lines 11 - 12	Internal strategy
	Page 20, lines 13 - 14	Internal metrics
	Page 20, lines 15 - 19	Internal strategy and metrics
	Page 20, lines 20 - 23	Internal strategy and metrics
	Page 20, lines 23 - 24	Non-public metrics
	Page 21, lines 12 - 14	Non-public metrics
	Page 21, lines 15 - 16	Non-public metrics
	Page 21, lines 17 - 18	Non-public metrics
	Page 22, lines 6 - 7	Non-public metrics
	Page 22, lines 10 - 11	Non-public metrics
	Page 22, lines 11 - 13	Non-public metrics
	Page 24, lines 6 - 7	Internal metrics
	Page 24, lines 10 - 11	Internal processes
	Page 24, line 12	Internal processes
	Page 24, lines 13 - 14	Internal processes
	Page 24, line 15	Internal processes
Exhibit 1	GOOG-RDGZ00117318 Complete document	Internal processes; Employee PII
Exhibit 2	GOOG-RDGZ-00209974	Internal terms
	GOOG-RDGZ-00209975	Employee PII
	GOOG-RDGZ-00209976	Employee PII
	GOOG-RDGZ-00210102	Internal strategy
Exhibit 5	GOOG-RDGZ-00144762	Internal strategy

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00144763	Internal processes
	GOOG-RDGZ-00144764	Internal processes
	GOOG-RDGZ-00144767	Internal processes
Exhibit 7	GOOG-RDGZ-00024709	Employee PII
	GOOG-RDGZ-00024710	Internal processes; Employee PII
	GOOG-RDGZ-00024711	Internal strategy; Employee PI
Exhibit 10	GOOG-RDGZ-00161367	Internal processes
	GOOG-RDGZ-00161373	Internal processes
	GOOG-RDGZ-00161378	Internal processes
	GOOG-RDGZ-00161384	Internal processes
	GOOG-RDGZ-00161385	Internal processes
	GOOG-RDGZ-00161392	Internal processes
	GOOG-RDGZ-00161393	Internal terms
	GOOG-RDGZ-00161394	Internal processes
	GOOG-RDGZ-00161395	Internal terms
	GOOG-RDGZ-00161396	Internal processes
	GOOG-RDGZ-00161397	Internal processes
	GOOG-RDGZ-00161398	Internal processes
	GOOG-RDGZ-00161399	Internal terms
	GOOG-RDGZ-00161401	Internal terms
	GOOG-RDGZ-00161406	Internal processes
	GOOG-RDGZ-00161408	Internal processes
	GOOG-RDGZ-00161409	Internal processes
	GOOG-RDGZ-00161410	Internal terms
	GOOG-RDGZ-00161411	Internal processes
	GOOG-RDGZ-00161412	Internal terms
	GOOG-RDGZ-00161414	Internal processes
	GOOG-RDGZ-00161417	Internal processes
	GOOG-RDGZ-00161418	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00161419	Internal processes
	GOOG-RDGZ-00161420	Internal terms
Exhibit 11	212:16 – 212:21	Internal processes
	213:8 – 213:9	Internal processes
	214:10 – 214:14; 214:18 – 214:21; 214:23 – 214:25	Internal processes
	215:1 – 215:5; 215:9 – 215:10; 215:15 – 215:24	Internal processes
	216:2 – 216:4	Internal processes
	217:3 – 217:6; 217:8 – 217:15	Internal processes
Exhibit 15	GOOG-RDGZ-00052784	Employee PII
	GOOG-RDGZ-00052785	Internal terms
	GOOG-RDGZ-00052787	Internal terms
	GOOG-RDGZ-00052788	Internal terms
	GOOG-RDGZ-00052789	Internal processes
	GOOG-RDGZ-00052790	Internal strategy
	GOOG-RDGZ-00052791	Internal strategy
	GOOG-RDGZ-00052792	Internal terms
	GOOG-RDGZ-00052793	Internal terms
	GOOG-RDGZ-00052794	Internal strategy
	GOOG-RDGZ-00052795	Internal strategy
	GOOG-RDGZ-00052797	Internal strategy
	GOOG-RDGZ-00052798	Internal strategy
	GOOG-RDGZ-00052799	Internal processes Internal strategy
	GOOG-RDGZ-00052801	Internal strategy
	GOOG-RDGZ-00052805	Internal processes
	GOOG-RDGZ-00052806	Internal processes
	GOOG-RDGZ-00052807	Internal strategy

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00052809	Internal processes
	GOOG-RDGZ-00052811	Internal strategy
	GOOG-RDGZ-00052812	Internal strategy
Exhibit 17	Pg. 3	Internal processes
	Pg. 4	Internal processes
Exhibit 42	GOOG-RDGZ-00151998	Internal processes
	GOOG-RDGZ-00152018	Employee PII
	GOOG-RDGZ-00152027	Employee PII
	GOOG-RDGZ-00152029	Employee PII
	GOOG-RDGZ-00152040	Internal strategy
Exhibit 43	Pg. 4	Internal processes
	Pg. 5	Internal processes
Exhibit 54	GOOG-RDGZ-0090236	Internal terms; Employee PII
	GOOG-RDGZ-0090238	Internal processes
	GOOG-RDGZ-0090239	Employee PII
	GOOG-RDGZ-0090242	Internal processes
	GOOG-RDGZ-0090243	Employee PII
	GOOG-RDGZ-0090244	Internal processes
	GOOG-RDGZ-0090245	Internal processes
	GOOG-RDGZ-0090246	Internal processes
	GOOG-RDGZ-0090247	Internal processes
	GOOG-RDGZ-0090249	Internal processes
	GOOG-RDGZ-0090250	Internal processes
	GOOG-RDGZ-0090251	Internal processes
	GOOG-RDGZ-0090252	Internal processes
	GOOG-RDGZ-0090253	Internal processes
Exhibit 55	GOOG-RDGZ-00043294 Complete document	Internal processes; Internal strategy; Internal terms; Employee PII
Exhibit 56	112:21 – 112:25	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Description
	113:1 – 113:2; 113:10 – 113:11	Internal processes
	114:8 – 114:11	Internal processes
	115:17 – 115:20	Internal processes
	116:1 – 116:8; 116:17 – 116:20	Internal processes
Exhibit 57	GOOG-RDGZ-00044356	Internal processes; Employee PII
Exhibit 59	GOOG-RDGZ-00173562	Internal processes; Employee PII
	GOOG-RDGZ-00173563	Employee PII
Exhibit 61	GOOG-RDGZ-00129084	Internal processes; Employee PII
	GOOG-RDGZ-00129085	Internal processes; Employee PII
	GOOG-RDGZ-00129086	Employee PII
	GOOG-RDGZ-00129087	Employee PII
	GOOG-RDGZ-00129088	Employee PII
	GOOG-RDGZ-00129089	Employee PII
	GOOG-RDGZ-00129090	Employee PII
	GOOG-RDGZ-00129091	Internal terms; Employee PII
	GOOG-RDGZ-00129092	Internal terms; Employee PII
	GOOG-RDGZ-00129093	Internal terms; Employee PII
	GOOG-RDGZ-00129094	Internal terms; Employee PII
	GOOG-RDGZ-00129095	Internal processes; Internal terms; Employee PII
Exhibit 65	GOOG-RDGZ-00092072	Employee PII
	GOOG-RDGZ-00092097	Internal processes
	GOOG-RDGZ-00092098	Internal processes



Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00092099	Internal strategy
	GOOG-RDGZ-00092100	Internal strategy
	GOOG-RDGZ-00092101	Internal strategy
Exhibit 68	GOOG-RDGZ-00129096	Internal terms; Employee PII
	GOOG-RDGZ-00129097	Employee PII
	GOOG-RDGZ-00129098	Employee PII
	GOOG-RDGZ-00129099	Employee PII
Exhibit 69	GOOG-RDGZ-0130381	Internal processes; Internal terms; Employee PII
Plaintiffs' Trial Plan ISO Motion for Class Certification	Pg. 1, Line 13	Internal processes
	Pg. 4, Lines 20 – 23, 24 – 25, 26	Internal processes; Internal terms
	Pg. 5, Lines 1 – 2, 19 – 22, 25 - 26	Internal processes; Internal terms

The following exhibits to Google's Opposition to Plaintiff's Motion for Class Certification [Dkts. 323 & 324]:

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
Exhibit 2	Pg. 4, lines 20-28	Internal processes
	Pg. 5, lines 1-6, 8-21	Internal processes
	Pg. 6, lines 12-28	Internal processes
	Pg. 7, lines 1-14, 23-28	Internal processes; Internal terms
	Pg. 8, lines 1-25	Internal processes; Internal terms
	Pg. 9, lines 1-24	Internal processes; Internal terms

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
	Pg. 10, lines 1-28	Internal processes; Internal terms
	Pg. 11, lines 1-28	Internal processes; Internal terms
	Pg. 12, lines 1-23	Internal processes; Internal terms
	Pg. 13, lines 1-28	Internal processes; Internal terms
	Pg. 14, lines 1-28	Internal processes; Internal terms
	Pg. 15, lines 1-28	Internal processes; Internal terms
	Pg. 16, lines 1-15, 17-28	Internal processes; Internal terms
	Pg. 17, lines 1-21	Internal processes; Internal terms
	Pg. 18, lines 1-25	Internal processes; Internal terms
	Pg. 19, lines 1-25	Internal processes; Internal terms
	Pg. 20, lines 1-26	Internal processes; Internal terms
	Pg. 21, lines 1-28	Internal processes; Internal terms
	Pg. 22, lines 1-28	Internal processes; Internal terms
	Pg. 23, lines 1-28	Internal processes; Internal terms
	Pg. 24, lines 1-24	Internal processes; Internal terms
	Pg. 25, lines 1-27	Internal processes; Internal terms
	Pg. 26, lines 1-28	Internal processes; Internal terms

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
	Pg. 27, lines 1-28	Internal processes; Internal terms
	Pg. 28, lines 1-28	Internal processes; Internal terms
	Pg. 29, lines 1-28	Internal processes; Internal terms
	Pg. 29, lines 1-14, 16-28	Internal processes; Internal terms
	Pg. 30, lines 1-7	Internal processes; Internal terms
Exhibit 3	GOOG-RDGZ-00056514 Complete document	Internal processes; Internal terms; Internal strategy; Employee PII
Exhibit 5	44:21-22	Internal processes; Internal terms
	72:16; 72:21	Internal processes; Internal terms
<i>Exhibit 6</i>	<i>Addressed in Exhibit 7 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	
<i>Exhibit 6-A</i>	<i>Addressed in Exhibit 8 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	
Exhibit 8	Pg. 4	Employee PII
<i>Exhibit 9</i>	<i>Addressed in Exhibit 5 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	
<i>Exhibit 11</i>	<i>Addressed in Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	
Exhibit 13	Pg. 91, Footnote 280	Internal terms
Exhibit 14	Pg. 6, lines 24-28	Internal processes; Internal terms
	Pg. 7, lines 1-5, 6-16	Internal processes; Internal terms

Exhibit No. / Document Title	Bates No. / Pages with Designations	Description
<i>Exhibit 19</i>	<i>Addressed in Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	
Exhibit 21	Pg. 12, 4-5	Internal processes; Internal terms
	Pg. 14, lines 5-14, 23	Internal processes; Internal terms
	Pg. 15, lines 13, 17-18, 24-27	Internal processes; Internal terms
	Pg. 16, lines 1-28	Internal processes; Internal terms
	Pg. 17, lines 1-28	Internal processes; Internal terms
	Pg. 18, lines 1-21	Internal processes; Internal terms
	Pg. 19, lines 1-8	Internal processes; Internal terms

The following exhibits to Plaintiffs' Reply in support of Motion for Class Certification [Dkt. 333]:

Exhibit No.	Bates No. / Pages with Designations	Description
Plaintiffs' Reply in Support of Motion for Class Certification	Pg. 12, Lines 9 – 11	Internal processes; Internal terms
Exhibit 70	223:8	Internal data log details
	223:10	Internal data log details
	223:13	Internal data log details
	223:20	Internal data log details
	223:25	Internal data log details
	224:6	Internal data log details
	225:10	Internal data log identifiers
	225:13	Internal data log identifiers

Exhibit No.	Bates No. / Pages with Designations	Description
	225:17	Internal data log identifiers
	225:18	Internal data log identifiers
	225:19	Internal data log identifiers
	225:24	Internal data log details
Exhibit 71	GOOG-RDGZ-00149617	Internal strategy Internal terms
	GOOG-RDGZ-00149618	Internal processes; Internal strategy
	GOOG-RDGZ-00149619	Internal processes; Internal terms
	GOOG-RDGZ-00149620	Internal processes; Internal strategy; Internal terms; Employee PII
	GOOG-RDGZ-00149621	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149622	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149623	Internal strategy Internal terms
	GOOG-RDGZ-00149624	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149625	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149626	Internal processes; Internal strategy; Internal terms; Employee PII
	GOOG-RDGZ-00149628	Internal processes; Internal strategy; Internal terms
	GOOG-RDGZ-00149630	Internal strategy

The following exhibits to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert Michael J. Lasinski [Dkt. 326]:

Exhibit No.	Bates No. / Pages with Designations	Description
Google LLC's Notice of Motion and Motion to Exclude Opinion of Plaintiffs' Damage Expert M.J. Lasinski	Page 4, line 9	Non-public metric
	Page 4, line 17	Non-public metric
	Page 5, line 4	Non-public metric
	Page 5, line 5	Non-public metric
	Page 12, line 10	Non-public metric
	Page 13, line 8	Non-public metric
	Page 13, line 11	Non-public metric
	Page 13, line 13	Non-public metric
	Page 13, line 16	Non-public metric
	Page 14, line 1	Non-public metric
	Page 14, line 10	Non-public metric
	Page 14, line 24	Non-public metric
	Page 24, Footnote 13	Non-public metric
Exhibit 1	24:13	Internal processes
	26:13 - 14, 26:16, 26:19 – 26:21	Internal processes
	28:4 - 28:10	Internal processes; Internal strategy
	57:25	Internal processes; Internal strategy
	58:1 – 58:7	Internal processes; Internal strategy
	59:7 – 59:12	Internal processes
	61:2 - 61:3, 61:5, 61:7 – 61:8, 61:11 – 61:12, 61:24 – 61:25	Internal processes; Internal strategy

Exhibit No.	Bates No. / Pages with Designations	Description
	62:1 – 62:2	Internal processes; Internal strategy
	71:4 – 71:9	Internal processes; Internal strategy
	74:17 – 74:19, 74:21 – 74:25	Internal processes; Internal strategy
	76:22 – 76:23	Internal processes; Internal terms
	77:4 – 77:25	Internal processes; Internal terms
	78:1 – 78:25	Internal processes; Internal terms
	79:1 – 79:14; 79:22 – 79:25	Internal processes; Internal terms
	80:1 – 80:3	Internal processes; Internal terms
	81:10 – 81:25	Internal processes; Internal terms
	82:1 – 82:25	Internal processes; Internal terms
	83:1 – 83:6, 83:16 – 83:25	Internal processes; Internal terms
	84:1 – 84:5, 84:13 – 84:25	Internal processes; Internal terms
	85:14 – 85:18, 85:22, 85:25	Internal processes; Internal terms
	86:1 – 86:3, 86:7 – 86:10, 86:13 – 86:15, 86:17 – 86:19, 86:24 – 86:25	Internal processes; Internal terms
	87:1 – 87:6, 87:15 – 87:25	Internal processes; Internal terms
	88:3 – 88:9, 88:19 – 88:21, 88:24 – 88:25	Internal processes; Internal terms
	89:3 – 89:17, 89:21 – 89:25	Internal processes; Internal terms
	90:1 – 90:25	Internal processes; Internal terms
	91:1 – 90:25	Internal processes; Internal terms
	92:1 – 92:5, 92:10 – 92:25	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	93:1 – 93:25	Internal processes; Internal terms
	94:1	Internal processes
	119:12 – 119:16	Internal processes
	120:17	Internal terms
	121:14 – 121:16	Internal processes
	122:15 – 122:25	Internal processes; Internal terms
	123:1 – 123:8, 123:13 – 123:24	Internal processes; Internal terms
	137:21 – 137:25	Internal processes; Internal terms
	138:1 – 138:6	Internal processes; Internal terms
	139:8 – 139:25	Internal processes; Internal terms
	140:1 – 140:7, 140:15 – 140:18, 140:22 – 140:24	Internal processes
	141:1 – 141:3, 141:6 – 141:14	Internal processes; Internal terms
	142:8 – 142:10, 142:13 – 142:22	Internal processes; Internal terms
	143:13 – 143:25	Internal processes; Internal terms
	144:11 – 144:25	Internal processes; Internal terms
	145:1 – 145:5	Internal processes; Internal terms
	151:11 – 151:15, 151:25	Internal processes; Internal terms
	152:1 – 152:8, 152:13 – 152:18, 152:23 – 152:25	Internal processes; Internal terms
	153:1 – 153:25	Internal processes; Internal terms
	154:1 – 154:25	Internal processes; Internal terms



Exhibit No.	Bates No. / Pages with Designations	Description
	155:4 – 155:25	Internal processes; Internal terms
	161:17 – 161:20, 161:22 – 161:25	Internal processes; Internal terms
	162:9 – 162:21	Internal processes; Internal terms
	163:4 – 163:7, 163:12 – 163:15, 163:23 – 163:25	Internal processes; Internal terms
	164:1 – 164:3, 164:15 – 164:25	Internal processes; Internal terms
	165:1 – 165:7, 165:13 – 165:25	Internal processes; Internal terms
	166:1 – 166:15, 166:17 - 166:20	Internal processes; Internal terms
	167:9 – 167:11, 167:21 – 23	Internal processes; Internal terms
	168:13 – 168:16, 168:19 – 168:21, 168:25	Internal processes; Internal terms
	169:1 – 169:5, 169:10 – 169:25	Internal processes; Internal terms
	170:1 – 170:25	Internal processes; Internal terms
	171:1 – 171:25	Internal processes; Internal terms
	172:12 – 172:25	Internal processes; Internal terms
	173:1 – 173:13	Internal processes; Internal terms
	174:14 – 174:25	Internal processes; Internal terms
	175:1 – 175:25	Internal processes; Internal terms
	176:1 – 176:14	Internal processes; Internal terms
	178:15 – 178:25	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	179:1 – 179:25	Internal processes; Internal terms
	180:1 – 180:25	Internal processes; Internal terms
	181:4 – 181:25	Internal processes; Internal terms
	182:1 – 182:23	Internal processes; Internal terms
	183:11 – 183:25	Internal processes; Internal terms
	184:1 – 184:11	Internal processes; Internal terms
	185:17 – 185:25	Internal processes; Internal terms
	186:1 – 186:7, 186:22 – 186:25	Internal processes; Internal terms
	187:1 – 187:17	Internal processes; Internal terms
	190:17 – 190:19	Internal processes; Internal terms
	191:12 – 191:18	Internal processes; Internal terms
	199:6 – 199:19	Internal processes; Internal terms
	200:21 – 200:24	Internal processes; Internal terms
	201:1 – 201:25	Internal processes; Internal terms
	202:1 – 202:25	Internal processes
	203:1 – 203:25	Internal processes; Internal terms
	204:1 – 204:15, 204:23 – 204:25	Internal processes; Internal terms
	205:1 – 205:26	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	206:1 – 206:24	Internal processes; Internal terms
	207:1 – 207:22	Internal processes; Internal terms
	208:3 – 208:6, 208:11 – 208:25	Internal processes; Internal terms
	209:1 – 209:13	Internal processes; Internal terms
	210:2 – 210:7, 210:9 – 210:25	Internal processes; Internal terms
	211:4 – 211:25	Internal processes
	212:4 – 212:15	Internal processes; Internal terms
	224:24 – 224:25	Internal processes
	225:1 – 225:6, 225:10, 225:12, 225:14 – 225:22	Internal processes; Internal metrics
	228:1, 228:3, 228:10, 228:12 – 228:18 228:24 – 228:25	Internal processes; Internal terms
	229:2, 229:4 – 229:17	Internal processes
	270: 8 – 270:10	Internal processes
Exhibit 3	Pg. 5, Para. v, Footnote 3	Internal processes; Internal terms
	Pg. 22, Para. 34	Internal processes; Internal metrics
	Pg. 25, Para. 42	Internal processes
	Pg. 26, Para. 43, Para. 44a, Footnote 102	Internal processes; Internal terms
	Pg. 27, Para. .44b, 44c, Footnote 102, Footnote 105	Internal processes; Internal terms
	Pg. 28, Para. 44c, Para. 45, Footnotes 109 – 11	Internal processes; Internal terms
	Pg. 29, Para. 46a, Para. 46b, Para. 46c, Footnote 113	Internal processes; Internal terms
	Pg. 20, Para. 46c, Para. 47, Footnote 116	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 32, Para. 49, Para. 51, Footnote 128	Internal processes; Internal terms
	Pg. 33, Para. 54	Internal processes
	Pg. 34, Para. 54, Para. 56,	Internal processes
	Pg. 35, Para. 56, Para. 57	Internal processes; Internal terms
	Pg. 36, Para. 57, Para. 58,	Internal processes; Internal terms
	Pg. 45, Para. 73, Footnote 161	Internal processes; Internal terms
	Pg. 50, Para. 82, Footnote 176	Internal processes; Internal terms
	Pg. 51, Para. 83	Internal processes; Internal terms
	Pg. 54, Para. 89, Para. 90	Internal processes; Internal terms
	Pg. 55, Para. 90, Para. 91, Footnotes 188 & 189	Internal processes; Internal terms
	Pg. 57, Para. 93, Footnote 196, Footnote 199	Internal processes; Internal terms
	Pg. 58, Para. 93, Para. 94, Footnotes 202 & 203	Internal processes; Internal terms
	Pg. 60, Para. 96, Footnote 207	Internal processes; Internal terms
	Pg. 61, Para. 97	Internal processes; Internal terms
	Pg. 62, Para. 97, Para. 98, Para. 99, Footnotes 215 – 219	Internal processes; Internal terms
	Pg. 63, Para. 99, Para. 101	Internal processes; Internal terms
	Pg. 64, Para. 101, Para. 103, Footnote 222	Internal processes; Internal terms
	Pg. 65, Para. 103, Para. 104	Internal processes; Internal terms
	Pg. 66, Para. 104, Para. 105	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 67, Para. 105, Para. 106, Footnotes 235 - 237	Internal processes; Internal terms
	Pg. 68, Para. 106, Para. 107, Footnote 243	Internal processes; Internal terms
	Pg. 69, Para. 109, Footnote 245	Internal processes; Internal terms
	Pg. 70, Para. 109, Para. 110, Para. 111, Footnote 247	Internal processes; Internal terms
	Pg. 71, Para. 111, Para. 112	Internal processes; Internal terms
	Pg. 72, Para. 113	Internal processes; Internal terms
	Pg. 73, Para. 114, Para. 115	Internal processes; Internal terms
	Pg. 74, Para. 115	Internal processes; Internal terms
	Pg. 76, Para. 120, Footnote 264	Internal processes; Internal terms
	Pg. 77, Para. 123	Internal processes; Internal terms
	Pg. 78, Para. 126, Footnote 271	Internal processes; Internal terms
	Pg. 79, Para. 128	Internal processes; Internal terms
	Pg. 83, Footnote 285	Internal processes; Internal terms
	Pg. 86, Para. 148	Internal processes; Internal terms
	Pg. 87, Para. 149, Para. 150, Footnotes 291 - 292	Internal processes; Internal terms
	Pg. 88, Para. 150, Footnote 295	Internal processes; Internal terms
	Exhibit 1A Entire page 118 of PDF	Internal processes; Internal terms
	Exhibit 1B Entire pages 119-120 of PDF	Internal processes; Internal terms

<b>Exhibit No.</b>	<b>Bates No. / Pages with Designations</b>	<b>Description</b>
	Exhibit 1C Entire page 121-122 of PDF	Internal processes; Internal terms
	Exhibit 2A Entire page 123 of PDF	Internal processes; Internal terms
	Exhibit 2B Entire page 124 of PDF	Internal processes; Internal terms
	Exhibit 3 Entire page 125 of PDF	Internal processes; Internal terms
	Exhibit 4A Entire page 126 of PDF	Internal processes; Internal terms
	Exhibit 4B Entire pages 127-128 of PDF	Internal processes; Internal terms
	Exhibit 4C Entire page 129-130 of PDF	Internal processes; Internal terms
	Exhibit 4D Entire page 131 of PDF	Internal processes; Internal terms
	Exhibit 4E Entire page 132 of PDF	Internal processes; Internal terms
	Exhibit 5A Entire page 133 of PDF	Internal processes; Internal terms
	Exhibit 5B Entire page 134 of PDF	Internal processes; Internal terms
	Exhibit 5C Entire page 135 of PDF	Internal processes; Internal terms
	Exhibit 5D Entire page 136 of PDF	Internal processes; Internal terms
	Exhibit 6A Entire page 137 of PDF	Internal processes; Internal terms
	Exhibit 6B Entire pages 138-139 of PDF	Internal processes; Internal terms
	Exhibit 6C Entire pages 140-141 of PDF	Internal processes; Internal terms
	Exhibit 6D Entire page 142 of PDF	Internal processes; Internal terms
	Exhibit 6E Entire page 143 of PDF	Internal processes; Internal terms

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	Exhibit 7C Entire page 146 of PDF	Internal processes; Internal terms
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Exhibit 5	153:12 – 15, 153:18-20, 153:23 - 24	Internal processes; Internal terms
	156:1-2	Internal processes
	247:10, 247:11-12, 247:14-15, 247:19	Internal processes
	248:7, 248:9-10, 248:12-13	Internal processes
	249:5-8	Internal processes; Internal terms
	257:12-14, 257-21-25	Internal processes; Internal terms
	258:1-2, 258:8-11, 258:13, 258:15-18, 258:22-24	Internal processes; Internal terms
	259:2-3, 259:17-19	Internal processes; Internal terms
	260:3-7	Internal processes; Internal terms
	275:16-20, 275:25	Internal processes; Internal terms
	276:2	Internal processes; Internal terms
	277:20-277:23	Internal processes; Internal terms
	278:4-10, 278:16-19, 278:21-23, 278:25	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	279:2	Internal processes
	280:11-12	Internal processes
	281:20-22	Internal processes; Internal terms
	283:10-12, 283:20-21, 283:25	Internal processes; Internal terms
	284:1, 285:9-10, 284:12-14, 284:25	Internal processes; Internal terms
	285:1, 285:5-7, 285:9-10, 285:11-14	Internal processes; Internal terms
	288:11-15	Internal processes; Internal terms
	292:5-6, 292:9-11, 292:23-25	Internal processes; Internal terms
	293:4-5, 293:11, 293:13-15, 293:25	Internal processes
	299:12, 299:17-20	Internal processes; Internal terms
	300:6-9	Internal processes; Internal terms
	308:17-19, 308:21, 208-23-4	Internal processes
	309:1	Internal processes
	318:13-14	Internal processes
	325:18-25	Internal processes; Internal terms
	330:15, 330:24	Internal terms
	332:2-3, 332:8, 332:13-14, 332:25	Internal processes; Internal terms
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	334:1	Internal processes
	337:4-6, 337:10-11, 337:15-17	Internal processes; Internal terms
	338:2-4, 338:9-10	Internal processes; Internal terms



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	369:4-7, 369:9-14, 369:15-18, 369:22-25	Internal processes; Internal terms
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Exhibit 7	Pg. 12, Para. 41	Internal processes; Internal terms
	Pg. 13, Para. 43	Internal processes; Internal terms
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	Pg. 28, Para. 74, Footnote 84	Internal processes; Internal terms
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	Pg. 32, Para. 83	Internal terms
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	Pg. 34, Para. 87, Para. .90	Internal processes; Internal terms
	Pg. 35, Para. 90, Para. 92	Internal processes; Internal terms
	Pg. 38, Para. 99	Internal processes; Internal terms
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	Pg. 48, Para. 123	Internal processes; Internal terms
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	Pg. 56, Para. 142	Internal processes; Internal terms
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	Pg. 58, Para. 146	Internal processes; Internal terms
	Pg. 59, Para. 146, Para. 147	Internal processes; Internal terms
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	Pg. 64, Footnote 195	Internal terms
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	Pg. 70, Para. 169	Internal processes; Internal terms
	Pg. 71, Para. 169, Para. 170	Internal processes; Internal terms
	Pg. 73, Para. 174	Internal processes; Internal terms
	Pg. 75, Para. 178	Internal processes; Internal terms
	Pg. 81, Para. 192	Internal terms

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	Pg. 86, Para. 201	Internal processes
	Pg. 91, Para. 210	Internal processes
	Pg. 93, Para. 214	Internal processes; Internal terms
Exhibit 8	Pg. 21	Employee PII
	Pg. 38, Para. 12-13	Internal processes; Internal terms
	Pg. 39, Paras. 14 – 16	Internal processes; Internal terms
	Pg. 40, Paras. 16 – 17	Internal processes; Internal terms
	Pg. 41, Paras. 17 – 19	Internal processes; Internal terms
	Pg. 42, Paras. 20 – 22	Internal processes; Internal terms
	Pg. 43, Paras. 22 – 24	Internal processes; Internal terms; Employee PII
	Pg. 44, Paras. 24 - 26	Internal processes; Internal terms; Employee PII
	Pg. 49, Para. 39	Internal processes; Internal terms
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Exhibit 10	Pg. 5, Lines 19, 23 – 26	Internal processes; Internal terms
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	Pg. 9, Lines 26 – 27	Internal processes; Internal terms
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	Pg. 12, Lines 9 – 10	Internal processes; Internal terms
	Pg. 14, Lines 10 – 19	Internal processes; Internal terms
	Pg. 15, Lines 1, 22-23	Internal processes; Internal terms
	Pg. 16, Lines 3 – 28	Internal processes; Internal terms
	Pg. 17, Lines 1 - 28	Internal processes; Internal terms
	Pg. 18, lines 1 – 21	Internal processes; Internal terms
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	Pg. 20, Lines 1 – 24	Internal processes; Internal terms
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Declaration of Michael Lasinski in Support of Plaintiffs’ Motion for Class Certification	Pg. 24, Lines 1 – 12	Internal processes; Internal terms
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	Pg. 3, Para. 1, Footnote 7	Internal processes
	Pg. 10, Para. 28	Internal processes
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	Pg. 12, Para. 33, Footnote 68	Internal processes
	Pg. 13, Para. 36	Internal processes; Internal terms
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	Pg. 18, Paras. 47, 48 & 49	Internal processes; Internal terms
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	Pg. 20, Paras. 52 – 54	Internal processes; Internal terms; Employee PII
	Pg. 21, Para. 55, 57, 58	Internal processes; Internal terms; Employee PII
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	Pg. 25, Paras. 65 - 67	Internal processes; Internal terms
	Pg. 26, Para. 68	Internal processes; Internal terms
	Pg. 27, Paras. 72 & 73	Internal processes; Internal terms
	Pg. 28, Para. 75	Internal processes; Internal terms
	Pg. 29, Paras. 78 – 79, 82	Internal processes; Internal terms
	Pg. 30, Paras. 83 – 86, Footnote 150	Internal processes; Internal terms
	Pg. 31, Paras. 86 – 88, Footnotes 161, 163	Internal processes; Internal terms

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	Pg. 32, Paras. 88 – 91, Footnote 166	Internal processes; Internal terms
	Pg. 33, Paras. 91, 93 – 95	Internal processes; Internal terms
	Pg. 34, Paras. 95-96	Internal processes; Internal terms
	Pg. 35, Paras. 97-99, Footnote 182	Internal processes; Internal terms
	Pg. 36, Paras. 99 – 100	Internal processes; Internal terms
	Pg. 37, Paras. 100-102	Internal processes; Internal terms
	Pg. 38, Paras. 102-103	Internal processes; Internal terms
	Pg. 39, Paras. 105 – 108	Internal processes; Internal terms
	Pg. 40, Paras. 108-100	Internal processes; Internal terms
	Pg. 41, Paras. 111-113	Internal processes; Internal terms
	Pg. 42, Paras. 113-114, 116-117	Internal processes; Internal terms
	Pg. 43, Paras. 117-120	Internal processes; Internal terms
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	Pg. 60, Para. 168	Internal processes; Internal terms
	Pg. 61, Paras. 171, 172, 173, Footnote 275	Internal processes; Internal terms
	Pg. 62, Para. 173	Internal processes; Internal terms
	PDF Pg. 86	Internal processes
	PDF Pg. 87	Internal processes
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	PDF Pg. 90, Notes 3 – 7	Internal processes; Internal terms
	PDF Pg. 91	Internal processes; Internal terms
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	PDF Pg. 99	Internal processes; Internal terms
	PDF Pg. 100	Internal processes; Internal terms
	PDF Pg. 101	Internal processes; Internal terms
	PDF Pg. 102	Internal processes; Internal terms
	PDF Pg. 103	Internal processes; Internal terms
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	PDF Pg. 106	Internal processes; Internal terms
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	PDF Pg. 111	Internal processes; Internal terms
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	PDF Pg. 119	Internal processes; Internal terms
	PDF Pg. 120	Internal processes; Internal terms
	PDF Pg. 121	Internal processes; Internal terms
	PDF Pg. 123	Internal processes; Internal terms
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	PDF Pg. 131	Internal processes; Internal terms
	PDF Pg. 132	Internal processes; Internal terms
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	PDF Pg. 140	Internal processes; Internal terms
	PDF Pg. 141	Internal processes; Internal terms
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Exhibit No.	Bates No. / Pages with Designations	Description
	PDF Pg. 143	Internal processes; Internal terms
	PDF Pg. 144	Internal processes; Internal terms
	PDF Pg. 145	Internal processes; Internal terms
	PDF Pg. 146	Internal processes; Internal terms
	PDF Pg. 147	Internal processes; Internal terms
	PDF Pg. 148	Internal processes; Internal terms
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	PDF Pg. 150	Internal processes; Internal terms
	PDF Pg. 151	Internal processes; Internal terms
	PDF Pg. 152	Internal processes; Internal terms

The following briefing and exhibits to Plaintiffs' Opposition to Google's Motion to Exclude Opinion of Michael J. Lasinski [Dkt. 331]:

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Plaintiffs' Opposition to Google's Motion to Exclude Opinion of Michael J. Lasinski	Pg. 3, Lines 25 – 28	Internal processes; Internal terms
	Pg. 4, Lines 1 – 3, 5-17, 21-24	Internal processes; Internal terms
	Pg. 5, Line 25	Internal processes
	Pg. 12, Lines 19 – 20	Internal processes
	Pg. 13, Lines 16-17, Footnote s 6 and 7	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 14, Lines 22-24	Internal processes; Internal terms
	Pg. 23, Lines 1-3	Internal processes; Internal terms
<i>Exhibit 1</i>	<i>Duplicative of Exhibit 1 to Google's Motion to Exclude Opinion of Michael J. Lasinski</i>	
<i>Exhibit 3</i>	<i>Duplicative of Exhibit 3 to Google's Motion to Exclude Opinion of Michael J. Lasinski</i>	
Exhibit 5	187:23-24	Internal terms
<i>Exhibit 6</i>	<i>Duplicative of Exhibit 15 to Plaintiffs' Motion for Class Certification</i>	
Exhibit 7	GOOG-RDGZ-00188469 Complete document	Internal processes, Internal terms
Exhibit 9	GOOG-RDGZ-00028472	Internal processes; Internal terms
	GOOG-RDGZ-00028473	Internal processes; Internal terms
	GOOG-RDGZ-00028474	Internal processes; Internal terms
	GOOG-RDGZ-00028475	Internal processes; Internal terms
	GOOG-RDGZ-00028476	Internal processes; Internal terms
	GOOG-RDGZ-00028477	Internal processes; Internal terms
	GOOG-RDGZ-00028478	Internal processes; Internal terms
	GOOG-RDGZ-00028479	Internal processes; Internal terms
	GOOG-RDGZ-00028480	Internal processes; Internal terms
	GOOG-RDGZ-00028481	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00028482	Internal processes; Internal terms; Internal strategy
	GOOG-RDGZ-00028483	Internal processes; Internal terms; Internal strategy
	GOOG-RDGZ-00028484	Internal processes; Internal terms; Internal strategy

The following pages in the Expert Report of Jonathan E. Hochman dated March 22, 2023 and Appendices filed within:

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 5, Para. 2	Internal strategy
	Pg. 22, Para 51	Internal processes
	Pg. 23, Footnote 32	Internal terms
	Pg. 24, Para. 54	Internal terms
	Pg. 24, Para. 55	Internal processes
	Pg. 24, Footnote 36	Internal processes; Internal strategy
	Pg. 26, Footnote 39	Internal terms
	Pg. 29, Para. 64	Internal terms
	Pg. 33, Para. 73	Internal strategy
	Pg. 33, Footnote 60-62	Internal strategy
	Pg. 39, Footnote 74	Internal strategy; Internal terms
	Pg. 49, Para. 107	Internal processes; Internal strategy
	Pg. 50-52, Para. 110	Internal processes; Internal strategy
	Pg. 50, Footnote 92	Internal strategy
	Pg. 52, Para. 112	Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 53, Para. 114	Internal processes
	Pg. 54, Paras. 115-117	Internal processes; Internal strategy
	Pg. 55, Para. 120	Internal processes
	Pg. 56, Footnote 95	Internal processes
	Pg. 56-57, Para. 124	Internal processes
	Pg. 58, Para. 125	Internal processes Internal terms
	Pg. 58-59, Para. 127	Internal processes
	Pg. 59, Para. 128	Internal processes
	Pg. 60-63, Para. 130	Internal processes
	Pg. 66-67, Paras. 138-139 and Footnote 106	Internal processes; Internal strategy; Internal terms
	Pg. 67-69, Para. 141	Internal processes; Internal strategy
	Pg. 67, Footnote 107	Internal processes; Internal terms
	Pg. 68, Footnote 108	Internal processes; Internal strategy
	Pg. 71, Footnote 113-114	Internal processes; Internal strategy
	Pg. 72, Para. 149	Plaintiffs' designations
	Pg. 73, Para. 152	Employee PII
	Pg. 75-79, Paras. 159-165	Internal processes; Internal strategy
	Pg. 77, Footnote 118-119	Internal processes; Internal strategy; Internal terms
	Pg. 79, Footnote 120	Internal processes; Internal terms
	Pg. 80, Para. 168	Internal processes; Internal strategy
	Pg. 81, Para. 169	Internal processes;
	Pg. 81-82, Para. 171	Internal processes; Internal strategy

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	Pg. 82, Paras. 173-174	Internal processes; Internal strategy
	Pg. 83-84, Paras. 175-177	Internal processes; Internal strategy
	Pg. 83, Footnote 128	Internal processes; Internal strategy
	Pg. 85, Para. 179	Internal terms
	Pg. 86, Para. 182	Plaintiffs' designations
	Pg. 88, Paras. 188-189	Internal processes; Internal terms
	Pg. 89-90, Para. 191	Plaintiffs' designations
	Pg. 89, Footnote 131	Plaintiffs' designations
	Pg. 91-92, Para. 192	Plaintiffs' designations
	Pg. 94, Para. 198	Internal terms
	Pg. 96, Para. 206	Internal processes; Internal strategy
	Pg. 97, Para. 207	Internal processes;
	Pg. 98, Para. 208	Internal processes; Internal terms
	Pg. 100, Paras. 213-214	Internal processes; Internal terms
	Pg. 100-101, Para. 216	Internal processes; Internal terms
	Pg. 101, Paras. 217-218	Internal terms
	Pg. 102,-103 Paras. 220-222	Internal processes; Internal strategy
	Pg. 104-106, Paras. 229-231	Internal processes; Internal terms
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	Pg. 108-109, Paras. 233-235	Internal processes; Internal terms
	Pg. 110, Para. 237	Internal terms
	Pg. 110-111, Paras. 238-239	Internal processes; Internal terms

<b>Exhibit No.</b>	<b>Bates No. / Pages with Designations</b>	<b>Description</b>
	Pg. 111, Footnote 141	Internal processes; Internal strategy
	Pg. 111-113, Paras. 241-243	Internal processes; Internal terms
	Pg. 113, Paras. 244-245	Plaintiffs' designations
	Pg. 113-114, Para. 246	Plaintiffs' designations
	Pg. 114, Footnote 144	Internal terms
	Pg. 114, Para. 248	Internal terms
	Pg. 116 ,Footnote 145	Internal processes
	Pg. 122, Para. 273	Internal processes
	Pg. 125, Para. 282	Internal processes
	Pg. 127, Para. 286	Internal processes; Internal strategy
	Pg. 131-132, Paras. 299-300	Internal processes; Internal terms
	Pg. 132-133, Para. 303	Internal processes; Internal strategy
	Pg. 133-134, Paras. 305-309	Internal processes; Internal strategy
	Pg. 134, Footnote 159	Internal processes; Internal terms
	Pg. 136, Para. 312	Internal processes; Internal terms
	Pg. 137-138, Paras. 318-319 and Footnote 162	Internal terms
	Pg. 138-141, Paras. 320-324	Internal processes; Internal terms
	Pg. 139, Footnote 163-164	Internal processes; Internal terms
	Pg. 140, Footnote 165	Internal processes; Internal terms
	Pg. 141, Para. 326	Internal terms
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	Pg. 147-148, Paras. 344-345	Internal processes; Internal strategy
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Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 149, Para. 351	Internal processes; Internal strategy
	Pg. 150, Para. 353	Internal processes; Internal terms
	Pg. 150, Para. 355	Internal processes; Internal strategy
	Pg. 150, Footnote 173-174	Internal processes; Internal strategy
	Pg. 151, Para. 356	Internal processes
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	Pg. 153, Para. 364	Internal terms
	Pg. 154, Para. 367	Internal processes; Internal terms
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Appendix E	Pg. 5 Footnote 16	Internal processes
	Pg. 7, Para. 13	Internal terms
	Pg. 10, Paras. 20-21	Internal processes; Internal strategy
	Pg. 10, Footnote 24	Internal processes
	Pg. 11-13, Paras. 23-26	Internal processes; Internal strategy
	Pg. 14, Para. 28	Internal processes; Internal terms
Appendix G	Pg. 1, Table of Contents	Internal terms
	Pg. 11, Para. 26	Internal terms
	Pg. 11, Heading 2.1	Internal terms
	Pg. 11-30, Paras. 28-73	Internal processes; Internal strategy; Internal terms



Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 31, Para. 74	Internal strategy; Internal terms
	Pg. 32, Paras. 79-80	Internal strategy; Internal terms
	Pg. 33, Paras. 83-85	Internal processes; Internal terms
	Pg. 34-37, Paras. 86-98	Internal processes; Internal strategy; Internal terms
	Pg. 37, Para. 100	Internal terms
	Pg. 39, Para. 106	Internal processes; Internal terms
	Pg. 40-41 ,Paras. 109-113	Internal processes; Internal terms
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Appendix I	Pg. 5, Paras. 13-14	Internal processes; Internal terms
	Pg. 10, Para. 36	Internal processes
	Pg. 28-29, Paras. 65-66	Internal processes; Internal strategy;
Appendix K	Complete Document	Internal processes; Internal strategy; Internal terms

Accordingly, the Court orders that the above-noted information should be sealed.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Honorable Richard Seeborg  
United States District Judge